

Case 1:24-cv-00061 Document 25 Filed 11/19/24 Page 1 of 3 PageID #: 80

against a new defendant, Mulberry Clinics, PLLC. Mulberry Clinics and Mulberry Spa are both owned and operated by Defendant Hutton.

Amending the Complaint to add this allegation and related defendant will not delay this litigation, as discovery is still underway and Norwood indicated in the original Complaint that she would seek to make this amendment. Further, adding the claim to the current lawsuit will allow for a more efficient litigation of these inter-related issues.

Counsel for Norwood consulted with counsel for Defendants Mulberry Spa and Hutton by email on October 30 and November 6, 2024. As of the date of filing this motion, they have not responded as to whether Defendants oppose the relief sought.

WHEREFORE, for the foregoing reasons, Norwood respectfully requests leave to file the attached First Amended Complaint and for process to issue for service on Mulberry Clinics, PLLC.

Respectfully submitted,

/s/ Elizabeth G. Hart
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Counsel for Elizabeth Norwood

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via the Court's electronic filing system on:

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on this the 19th day of November 2024.

/s/ Elizabeth G. Hart
Elizabeth G. Hart